

UNITED STATES DISTRICT COURT

for the
Southern District of Ohio

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In the Matter of the Search of

USPS Priority Mail parcel 9405 5368 9784 6173 0120 53
addressed to "RYNE MAYER, 7309 COUNTRY MDWS, PLAIN
CITY OH 43064-8407"

Case No.

2:19-mj-950

APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property

USPS Priority Mail parcel 9405 5368 9784 6173 0120 53 addressed to "RYNE MAYER, 7309 COUNTRY MDWS, PLAIN CITY OH 43064-8407"

located in the Southern District of Ohio, there is now concealed (identify the person or describe the property to be seized):

A quantity of a controlled substance and/or proceeds which are evidence thereof, and/or contraband, in violation of Title 21, United States Code, Sections 841(a)(1) and 843(b).

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- ☒ evidence of a crime;
☒ contraband, fruits of crime, or other items illegally possessed;
☒ property designed for use, intended for use, or used in committing a crime;
☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

Code Section

21 U.S.C. 841(a)(1)
 21 U.S.C. 843(b)

Offense Description

Possession with intent to distribute a controlled substance
 Prohibited use of a communication center (U.S. Mail)

The application is based on these facts:

As set forth in the attached Affidavit of Postal Inspector Justin D. Koble

- ☒ Continued on the attached sheet.
☐ Delayed notice of _____ days (give exact ending date if more than 30 days: _____) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

Sworn to before me and signed in my presence.

Date:

Dec 6, 2019

City and state: Columbus, Ohio

Justin D. Koble, U.S. Postal Inspector
 Printed name and title

Hon. Kimberly A. Jolson, U.S. Magistrate Judge
 Printed name and title

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION

IN THE MATTER OF THE SEARCH OF:

United States Postal Service Priority Mail
parcel bearing tracking number 9405 5368
9784 6173 0120 53 addressed to
"RYNE MAYER, 7309 COUNTRY MDWS
PLAIN CITY OH 43064-8407"

Case No. 2:19-mj-950

MAGISTRATE JUDGE
Kimberly A. Jolson

AFFIDAVIT IN SUPPORT OF AN APPLICATION FOR A SEARCH WARRANT

I, Justin D. Koble, Postal Inspector, being duly sworn, depose and state as follows:

1. I have been a U.S. Postal Inspector for the past 4 years, enforcing federal mail and drug laws; currently assigned to Columbus, OH. I have received training at the U.S. Postal Inspection Service National Training Seminars for mail-related criminal investigations and have investigated cases with other federal, state, and local police units.
2. The U.S. Postal Inspection Service is aware that drug traffickers have been using Priority Mail, a business-oriented service offered by the United States Postal Service (USPS), to transport controlled substances and transfer funds, cash or otherwise, to further their enterprises. As a result of past investigations and prosecutions, the Postal Inspection Service has determined that a number of indicators can be used to identify packages containing contraband that have been entered into the Priority Mail network. Inspectors routinely review shipment documents and Priority Mail parcels originating from or destined to drug source areas to identify instances where there is a possibility of drug trafficking.
3. On December 5, 2019, U.S. Postal Inspectors identified a USPS Priority Mail parcel with tracking number 9405 5368 9784 6173 0120 53 (hereinafter the "Subject Parcel"), which was believed to contain narcotics due to routine profiling. Inspectors identified this as a suspect drug parcel based on several characteristics, including but not limited to type of mail, origin, destination, postage, and size.
4. On December 5, 2019, U.S. Postal Inspectors took custody of the Subject Parcel which was observed to be addressed to "RYNE MAYER, 7309 COUNTRY MDWS, PLAIN CITY OH 43064-8407" with a return address of "SHOUT AND ABOUT, 1547 ECHO PARK AVE., LOS ANGELES CA 90026". The Subject Parcel is a white USPS Priority Mail flat rate envelope measuring approximately 10" x 6" x 1/2" and weighing approximately 67 grams. The Subject Parcel was determined to have been mailed from the Los Angeles, CA area on or about December 2, 2019 with \$5.58 in electronic postage affixed.

5. Your affiant knows from previous training, experience and seizures that the type of electronic postage affixed to the Subject Parcel is associated with illegal Dark Web activity. The postage meter used to purchase this electronic postage is currently leased by the USPS to a shipping company doing business as EasyPost. EasyPost then subleases this particular meter to a company doing business as Bitcoinpostage.info. Bitcoinpostage.info sells USPS postage in exchange for bitcoin payment allowing users to anonymously purchase postage and print mailing labels. The ability to purchase USPS postage using bitcoin, a form of electronic currency, is appealing to individuals involved in the sale and distribution of controlled substances on dark web marketplaces because it allows for the purchase of this postage without having to first convert funds to US currency.
6. On December 5, 2019, checks of USPS, law enforcement, and open-source databases were conducted to determine the validity of the recipient name and address indicated on the Subject Parcel "RYNE MAYER, 7309 COUNTRY MDWS, PLAIN CITY OH 43064-8407". According to USPS databases, 7309 Country Meadows is a valid address in the 43064 zip code and Ryne Mayer is currently associated with the address.
7. On December 5, 2019, checks of USPS, law enforcement, and open-source databases were conducted to determine the validity of the return name and address indicated on the Subject Parcel "SHOUT AND ABOUT, 1547 ECHO PARK AVE., LOS ANGELES CA 90026". According to USPS databases, 1547 Echo Park Avenue is a valid address in the 90026 zip code. Shout and About was determined to be a stationary and gift boutique currently in operation at that address.
8. On December 5, 2019, your affiant contacted the owner of Shout and About. The owner confirmed they do mail parcels via USPS but stated they did not mail the Subject Parcel and do not utilize EasyPost/Bitcoinpostage.info for mailings.
9. Your affiant knows in the past, drug traffickers, particularly drug traffickers who utilize dark web marketplaces have used legitimate names at legitimate addresses to receive parcels containing illegal narcotics, in an attempt to legitimize the shipment and reduce the chance of the parcel being identified as suspicious. In addition, individuals who use USPS for the shipment of illegal narcotics will frequently utilize the name and/or of a legitimate business without that businesses knowledge or consent for the same reasons. Additionally, California is a known source area for shipment of illegal narcotics to Central Ohio as well as other areas of the United States.
10. On December 5, 2019, Postal Inspectors contacted Sargent Steve Redding, Columbus Division of Police, who is the handler for "Rocco," a drug detection dog most recently certified by the Ohio Peace Officers Training Council for the detection of cocaine, "crack," heroin, and methamphetamine. K-9 "Rocco" has had 200 hours of training at Gold Shield Training Kennels, Blacklick, OH, a well-established and regarded training facility for police canines. Both in training and actual deployments, K-9 "Rocco" has successfully detected narcotics; demonstrating clear, positive, aggressive (scratch) alerts, establishing himself as a highly reliable police dog.

11. The Subject Parcel was hidden among other parcels, and K-9 "Rocco" was allowed to search the entire area. Sargent Redding concluded that K-9 "Rocco" did alert positively to the Subject Parcel. Based on that alert, Sargent Redding concluded that the odor of one of the drugs that K-9 "Rocco" is trained and certified to detect was present.
12. Based on the information contained herein, your affiant maintains there is probable cause to believe that the USPS Priority Mail Express parcel bearing tracking number 9405 5368 9784 6173 0120 53, the Subject Parcel, contains controlled substances and/or contraband, in violation of Title 21, United States Code, Sections 841(a)(1) and 843(b). Based on the facts set forth in this affidavit, I submit that there is probable cause to believe that controlled substances are being concealed in the parcel, and seek the issuance of a warrant to search the parcel for controlled substances to be seized.

Respectfully submitted,



Justin D. Koble, United States Postal Inspector

Subscribed and sworn to before me on July Dec. 4, 2019.



Honorable Kimberly A. Jolson
UNITED STATES MAGISTRATE JUDGE

